

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**EMMANUEL C. GONZALEZ,**

**Plaintiff,**

**vs.**

**BONANZA.COM, INC.,**

**Defendant.**

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**Case No. 2:14-cv-0187**

**JURY DEMAND**

**STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE**

The plaintiff, Emmanuel C. Gonzalez, and defendant, Bonanza.com, Inc., pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing all claims and counterclaims in this action WITH PREJUDICE, subject to the terms of that certain agreement entitled “**SETTLEMENT AND LICENSE AGREEMENT**” and having an effective date of May 28, 2014, with each Party to bear its own costs, expenses and attorneys’ fees. The parties request the Court retain jurisdiction to enforce the terms of the parties’ Settlement and License Agreement.

A proposed Order is being submitted herewith.

Date: June 2, 2014

Respectfully submitted,

/s/ M. Scott Fuller

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 2, 2014, the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Texas, using the Court's Electronic Case Filing (ECF) system. The ECF system routinely sends a "Notice of Electronic Filing" to all attorneys of record who have consented to accept this notice as service of this document by electronic means.

/s/ M. Scott Fuller